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U.S. DISTRICT COURT

2012 FEB -9 P 2:47

DEBORAH TUCKER,

: UNITED STATES DISTRICT COURT
: DISTRICT OF NEW JERSEY

Plaintiff(s),

: Case No.: 2:11-cv-03941-ES-CLW

vs.

:

CARLSON HOTELS d/b/a RADISSON,
GF MANAGEMENT, INC., VALLEY
FORGE COLONIAL LIMITED
PARTNERSHIP, WCI GROUNDS
MAINTENANCE SERVICES, L.L.C.,
JOHN DOE 1-5 and ABC-XYZ CORP.
(such names being fictitious),

: SECOND AMENDED COMPLAINT
: AND JURY DEMAND

Defendant(s).

:

Plaintiff, **DEBORAH TUCKER**, residing in the Borough of Roselle, County of Union and State of New Jersey by way of Complaint against the defendants, says:

FIRST COUNT

1. On or about February 13th, 2010, Plaintiff, **DEBORAH TUCKER**, was an invitee/guest on the premises, owned, operated, leased and/or maintained by the Defendants, **CARLSON HOTELS d/b/a/ RADISSON, GF MANAGEMENT, INC., VALLEY FORGE COLONIAL LIMITED PARTNERSHIP, WCI GROUNDS MAINTENANCE SERVICES, L.L.C., JOHN DOE 1-5 and ABC CORP.- XYZ CORP.**, (such latter names being fictitious), located in Valley Forge, Pennsylvania. These Defendants are

companies, entities and/or individuals having a place of business and authorized to do business in the County of Middlesex and State of New Jersey.

2. At all times herein mentioned the Defendant(s), **CARLSON HOTELS** d/b/a/ **RADISSON, GF MANAGEMENT, INC., VALLEY FORGE COLONIAL LIMITED PARTNERSHIP, WCI GROUNDS MAINTENANCE SERVICES, L.L.C., JOHN DOE 1-5** and **ABC CORP.- XYZ CORP.,** (such latter names being fictitious), were engaged in the repair, maintenance and upkeep of said premises.

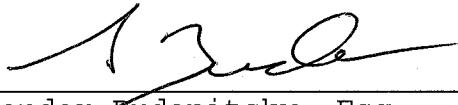
3. At said time and place, Plaintiff, **DEBORAH TUCKER**, was caused injury due to the negligence of Defendant(s), **CARLSON HOTELS** d/b/a/ **RADISSON, GF MANAGEMENT, INC., VALLEY FORGE COLONIAL LIMITED PARTNERSHIP, WCI GROUNDS MAINTENANCE SERVICES, L.L.C., JOHN DOE 1-5** and **ABC CORP.- XYZ CORP.,** (such latter names being fictitious), due to improper and negligent conditions, known to exist, and/or for which defendants should have reasonably known to exist by the named Defendants.

4. At said time and place, Plaintiff, **DEBORAH TUCKER**, was caused injury due to the negligence of Defendant(s), **CARLSON HOTELS** d/b/a/ **RADISSON, GF MANAGEMENT, INC., VALLEY FORGE COLONIAL LIMITED PARTNERSHIP, WCI GROUNDS MAINTENANCE SERVICES, L.L.C., JOHN DOE 1-5** and **ABC CORP.- XYZ CORP.,** (such latter names being fictitious), due to improper and negligent conditions, known to exist, and/or for which defendants should have reasonably known to exist by the named Defendants.

5. As a direct and proximate result of the foregoing, the Plaintiff, **DEBORAH TUCKER**, was caused to sustain serious, painful and permanent injuries, has experienced great pain and suffering, has suffered great shock and mental anguish, will in the future experience great pain and suffering, was caused to incur great expenses for medical care and attention, will in the future incur additional expenses, was caused to lose large sums of money for wages she would have earned but for her injuries and will in the future lose large sums of money for wages, and has in the past, and will in the future, lose her right to the full enjoyment of life.

WHEREFORE, Plaintiff, **DEBORAH TUCKER**, demands judgment against the Defendant(s), **CARLSON HOTELS d/b/a/ RADISSLON, GF MANAGEMENT, INC., VALLEY FORGE COLONIAL LIMITED PARTNERSHIP, WCI GROUNDS MAINTENANCE SERVICES, L.L.C., JOHN DOE 1-5 and ABC CORP.- XYZ CORP.**, jointly and/or severally, in an amount sufficient to compensate her for her injuries, medical expenses, interest and costs of suit.

DATED: February 9, 2012



Sander Budanitsky, Esq.
Attorney for the Plaintiff(s)

JURY DEMAND

Plaintiff demands a trial by jury as to all Counts of the within Complaint.

DATED: February 9, 2012



Sander Budanitsky, Esq.
Attorney for the Plaintiff(s)